

**STATEMENT OF BASIS (AI No. 19054)**

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0091413 to discharge to waters of the State of Louisiana.

**THE APPLICANT IS:** Hi-Seas of Dulac, Inc.  
Hi-Seas of Dulac, Inc. #1  
6570 Grand Caillou Rd.  
Dulac, LA 70353

**ISSUING OFFICE:** Louisiana Department of Environmental Quality (LDEQ)  
Office of Environmental Services  
Post Office Box 4313  
Baton Rouge, Louisiana 70821-4313

**PREPARED BY:** Kelli Hamilton

**DATE PREPARED:** March 1, 2007

**1. PERMIT STATUS**

**A. Reason For Permit Action:**

Permit reissuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term.

**B.** LPDES permit - LPDES permit effective date: September 1, 2002  
LPDES permit expiration date: August 31, 2007  
EPA has not retained enforcement authority.

**C.** Date Application Received: February 6, 2007

**2. FACILITY INFORMATION**

**A. FACILITY TYPE/ACTIVITY - shrimp unloading and boiling facility**

This is an existing facility in which shrimp are unloaded from boats into a deicer tank which separates the shrimp from the ice and washes them before being weighed and repacked with ice for shipment to plants. Some shrimp is boiled and then dried for sale.

**B. FEE RATE**

1. Fee Rating Facility Type: minor
2. Complexity Type: II (BPJ points to 0 as per administrative decision)
3. Wastewater Type: II
4. SIC code: 2092

**C. LOCATION -** 8345 Shrimpers Row in Dulac, Terrebonne Parish  
Latitude 29°22'09", Longitude 90°43'23"

### 3. OUTFALL INFORMATION

#### Outfall 001

Discharge Type: treated sanitary wastewater  
Treatment: packaged aeration treatment plant  
Location: at the point of discharge from the sanitary treatment system  
(Latitude 29°22'07", Longitude 90°43'21")  
Flow: 300 gpd  
Discharge Route: Bayou Grand Caillou

#### Outfall 002A&B

Discharge Type: shrimp unloading tank wastewater  
Treatment: none  
Location: at the point of discharge from the tanks located on the east side  
of the facility (Latitude 29°22'08", Longitude 90°43'21")  
Flow: 200 gpd per deicer tank  
Discharge Route: Bayou Grand Caillou

#### Outfall 003

Discharge Type: shrimp boiling wastewater, floor and equipment washdown  
wastewater  
Treatment: none  
Location: at the point of discharge located on the southeast corner of the  
facility (Latitude 29°22'08", Longitude 90°43'21")  
Flow: 800 gpd  
Discharge Route: Bayou Grand Caillou

### 4. RECEIVING WATERS

STREAM - Bayou Grand Caillou

BASIN AND SEGMENT - Terrebonne Basin, Segment 120502

DESIGNATED USES - a. primary contact recreation  
b. secondary contact recreation  
c. propagation of fish and wildlife  
e. oyster propagation

### 5. PROPOSED EFFLUENT LIMITS

BASIS - See Rationale below.

Summary of Proposed Changes From the Current LPDES Permit: monitoring of  
Outfalls 002 A&B has increased from semiannually to once per quarter to be  
consistent with existing permits for similar outfalls.

## 6. COMPLIANCE HISTORY/COMMENTS

### A. Compliance History

No records of recent compliance actions were found.

B. DMR Review/Excursions - "No Discharge" was reported on DMRs for the following months: 6/03, 6/04, 6/06. No DMRs for Outfalls 001 and 003 were submitted in 2005. The excursions are as follows:

<u>Date</u>	<u>Parameter</u>	<u>Outfall</u>	<u>Reported Value</u>	<u>Permit Limits</u>
12/02	Fecal Coliform	001	20,000	43
12/02	BOD	003	49	45
12/03	BOD	003	641	45
12/03	TSS	003	190	45
12/03	Oil and Grease	003	17	15

## 7. EXISTING EFFLUENT LIMITS

### Outfall 001 -

BOD	---:45 mg/l
TSS	---:45 mg/l
Fecal Coliform	---:43
pH	6-9

### Outfall 002A&B

BOD	Report:Report mg/l
TSS	Report:Report mg/l
Oil&Grease	Report:Report mg/l
pH	6-9

### Outfall 003 -

BOD	---:45 mg/l
TSS	---:45 mg/l
Oil&Grease	---:15 mg/l
Chlorides	Report:Report mg/l
pH	6-9

## 8. ENDANGERED SPECIES

The receiving waterbody, Subsegment 120502 of the Terrebonne Basin is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated September 29, 2006 from Watson (FWS) to Brown (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. It was determined that the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat.

## **9. HISTORIC SITES**

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

## **10. TENTATIVE DETERMINATION**

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to reissue a permit for the discharge described in the application.

## **11. PUBLIC NOTICES**

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

## **12. STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT**

A SWP3 is included in the permit because in accordance with LAC 33:IX.2511.A.1, storm water shall not be required to obtain and LPDES permit "... except... discharges associated with industrial activity." In accordance with LAC 33:IX.2511.B.14.a-k, facilities classified as SIC code 2092 are considered to have storm water discharges associated with industrial activity.

The SWP3 shall be prepared, implemented, and maintained within (6) months of the effective date of the final permit. The plan should identify potential sources of storm water pollution and ensure the implementation of practices to prevent and reduce pollutants in the storm water discharges associated with industrial activity at the facility (see Narrative Requirements for the AI).

**Rationale for Hi-Seas of Dulac, Inc.**

**1. Outfall 001 treated sanitary wastewater (estimated flow is 300 gpd)**

<u>Pollutant</u>	<u>Limitation</u>	<u>Reference</u>
	Mo. Avg: Weekly Avg. (mg/l)	
Flow	Report: Report	See limits justification (2) below
BOD <sub>5</sub>	--:45	See limits justification (1), (2) below
TSS	--:45	See limits justification (1), (2) below
Fecal Coliform	---:43	See limits justification (1), (2) below
pH (s.u.)	6.0:9.0 (min:max)	See limits justification (2) below

**Treatment:** packaged aeration unit

**Monitoring Frequency:** All parameters shall be monitored once per six (6) months in accordance with the current permitting practices for similar outfalls.

**Limits Justification:**

- 1) Sanitary wastewater regulated in accordance with LAC 33:IX.711 or LAC 33:IX.709.B - Concentration limits are used in accordance with LAC 33:IX.2709.F.1.b which states that mass limitations are not necessary when applicable standards and limitations are expressed in other units of measurement. LAC 33:IX.709.B references LAC 33:IX.711 which expresses BOD<sub>5</sub> and TSS in terms of concentration. Fecal Coliform limits have been set as per LAC 33:IX.1113.C.5.iv.
- 2) BPJ utilizing the LPDES Class I Sanitary General Permit

**2. Outfall 002 A&B, shrimp unloading tank wastewater (estimated flow is 200 GPD each)**

<u>Pollutant</u>	<u>Limitation</u>	<u>Reference</u>
	Mo. Avg: Daily Max (mg/l)	
Flow	--:Report	BPJ, *
BOD <sub>5</sub>	--:Report	BPJ, *
TSS	--:Report	BPJ, *
Oil & Grease	--:Report	BPJ, *
pH	6.0 su to 9.0 su	BPJ, *

**Treatment:** None

**Monitoring Frequency:** Once per quarter by grab sample. BPJ based on existing permits for similar outfalls.

**Limits Justification:** Flow reporting is in accordance with LAC 33:IX.2707.I.2.b. The Canned and Preserved Seafood Processing ELGs (40 CFR 408) do not apply to the effluent at this outfall. Report only requirements for BOD, TSS and Oil & Grease, and pH limits of 6.0 to 9.0 su have been placed in the permit based on BPJ and existing permits for similar outfalls. Accumulated data will be used to assess the potential problems associated with discharges of this type. After sufficient information has been collected, a determination of the appropriate parameters and limitations for this type of discharge will be made.

3. **Outfall 003** shrimp boiling wastewater, floor and equipment washdown wastewater (estimated flow is 800 gpd)

<u>Pollutant</u>	<u>Limitation</u>	<u>Reference</u>
	Mo. Avg: Daily Max (mg/l)	
Flow	Report: Report	LAC 33:IX.2707.I.2.b.
BOD <sub>5</sub>	--:45	LPDES Class I Sanitary General Permit
TSS	--:45	LPDES Class I Sanitary General Permit
Oil and Grease	--:15	LPDES Class I Sanitary General Permit
Chlorides	--:Report	BPJ; see justification below
pH (s.u.)	6.0:9.0 (min:max)	LPDES Class I Sanitary General Permit

**Treatment:** None

**Monitoring Frequency:** Semiannually by grab sample.

**Limits Justification:** There are no applicable guidelines for this type of wastewater, therefore Class I Sanitary Limitations are referenced as justification as wastewaters are similar. Chlorides have been added as a pollutant of concern due to salt content utilized in the shrimp boiling process. Report only requirement for chlorides have been placed in the permit under BPJ. The accumulated data will be used to assess the potential problems associated with discharges of this type. After sufficient information has been collected, a determination of the appropriate parameters and limitations will be made for these types of discharges.

\* Existing permits for similar outfalls  
 BPJ Best Professional Judgement  
 su Standard Units

**NOTE**

For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.

TMDL Waterbodies

Subsegment 120502, Bayou Grand Caillou - From Bayou Pelton to the boundary between segments 1205 and 1207 (Estuarine), is listed on LDEQ's Final 2004 303(d) List as impaired for pathogen indicators. To date no TMDL's have been completed for this subsegment. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by a TMDL. Until completion of TMDL's for the Terrebonne Basin, those suspected causes for impairment which are not directly attributed to the shrimp processing facility point source category have been eliminated in the formulation of effluent limitations and other requirements of this permit. Additionally, suspected causes of impairment which could be attributed to pollutants which were not determined to be discharged at a level which would cause, have the reasonable potential to cause or contribute to an excursion above any present state water quality standard were also eliminated. Therefore, for the purposes of this permit, pathogen indicators will be addressed in a manner consistent with the Department's permitting guidance for implementing Louisiana's surface water quality standards as follows:

Pathogen Indicators

A fecal coliform limit has been established in accordance with sanitary discharges.